



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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August 20, 2020

**VIA ECF**

Honorable Ramon E. Reyes  
United States Magistrate Judge  
United States District Court  
Eastern District of New York

Re: Jennifer Padilla v. City of New York, et al.  
19-CV-3703 (DLI) (RER)

Your Honor:

I am a Senior Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, and the attorney assigned to represent defendants in the above-referenced matter. The parties write jointly to respectfully submit a revised case management plan. As an initial matter, the undersigned apologizes to the Court for the delay in this submission.

Plaintiff has sent a proposed stipulation of dismissal to defendants to withdraw the claims of assault and battery, deliberate indifference, and municipal liability from the instant action, and to amend the state court action to include those claims. The parties are currently working toward finalizing that stipulation. In light of the proposed stipulation, and the manner in which it would change the case, the parties now request that the Court schedule a settlement conference in forty-five (45) days. Should the parties be unable to reach a resolution of the case at that time, the parties would seek to complete depositions within forty-five (45) days of the completion of the settlement conference.

Thank you for your consideration herein.

Respectfully submitted,

/s

Omar J. Siddiqi  
*Senior Counsel*

cc: Gabriel Harvis and Baree Fett (By ECF)  
*Attorneys for Plaintiff*